

THE UNITED STATES BANKRUPTCY  
COURT FOR THE EASTERN DISTRICT  
OF TEXAS SHERMAN DIVISION

IN RE:	§	
	§	
LAWRENCE EDWARD CREED	§	CASE NO. 15-40892-R
	§	
	§	CHAPTER 13
	§	
DEBTOR	§	

OBJECTION TO MOTION TO DISMISS

COMES NOW Chris Moser, Chapter 7 Trustee, and files this Objection to Motion to Dismiss and Setting Hearing in the above numbered and styled proceeding, and for cause would show the Honorable Court as follows:

1. The Debtor entered into a written agreement with Chapter 7 Trustee Chris Moser while this matter was pending in Chapter 7.
2. In order to secure withdrawal of the Chapter 7 Trustee's objection to conversion to Chapter 13, the debtor agreed that in the event that any assigned Chapter 13 Trustee sought dismissal for any reason, the case would be converted back to Chapter 7 (the "Agreed Order").
3. A true and correct copy of the Agreed Order is attached hereto as Exhibit "A" and is incorporated fully herein for all purposes.

WHEREFORE, PREMISES CONSIDERED, Chris Moser, Chapter 7 Trustee, prays that the Chapter 13 Trustee's Motion to Dismiss be Denied, and that he be granted leave to file the appropriate motion to convert this matter back to Chapter 7 in accordance with the Bankruptcy Code.

Respectfully submitted,

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By: /s/ Kelly B. Williamson  
Kelly B. Williamson  
State Bar No. 00785260

ATTORNEY FOR TRUSTEE  
CHRIS MOSER

CERTIFICATE OF  
SERVICE

This is to certify that a true and correct copy of the foregoing Objection Motion to Dismiss and Setting Hearing has been served upon the following parties in interest by mailing a copy of same to them via first class mail and uploaded to the Court for service by the Bankruptcy Noticing Center to the parties on the Court's mailing matrix on the date set forth below .

LAWRENCE EDWARD  
CREED 2404 BERETTA  
MESQUITE, TX 75181

Carey D. Ebert, Chapter 13 Trustee,  
Office of the Standing Chapter 13 Trustee  
500 North Central Expressway, Suite 350  
Plano, Texas 75074

VERONICA DEAVER  
LAW OFFICES OF VERONICA DEAVER  
P. O. BOX 2248  
MCKINNEY, TX 75070

/s/ Kelly B. Williamson